

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

W.R. GRACE & CO., *et al.*¹

Reorganized Debtors.

Chapter 11

Case No. 01-01139 (AMC)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 102(1) of title 11 of the United States Code, §§ 101–1532, as amended (the “Bankruptcy Code”), Bayard, P.A. (“Bayard”), Goodwin Procter LLP (“Goodwin”) and Ford Marrin Esposito Witmeyer & Gleser, LLP (“Ford Marrin”), hereby enters their appearance in the above-referenced chapter 11 cases (the “Chapter 11 Cases”) as counsel to Continental Casualty Company and Transportation Insurance Company, (collectively “Continental Casualty”), and hereby requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 342 of the Bankruptcy Code, and the *Order Authorizing the Elimination of the Existing 2014 Service List and the Creation of a New Service List* [D.I. 33138], that they be added to the new service list and that copies of all notices and pleadings given or required to be given in the Chapter 11 Cases and copies of all papers served or required to be served in the Chapter 11 Cases, including but not limited to all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements, and all other matters arising herein or in any related adversary proceeding, be given and served upon Continental Casualty

¹ The Reorganized Debtor is W.R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.)

through service upon Bayard, Goodwin and Ford Marrin at the address, emails, and/or facsimile number set forth below:

BAYARD, P.A.
Scott D. Cousins
Evan T. Miller
Sophie E. Macon
600 N. King Street, Suite 400
Wilmington, DE 19801
Telephone: (302) 655-5000
Facsimile: (302) 658-6395
Email: scousins@bayardlaw.com
emiller@bayardlaw.com
smacon@bayardlaw.com

GOODWIN PROCTER LLP
Michael S. Giannotto
Brian T. Burgess
1900 N. Street NW
Washington, DC 20036
Tel.: (202) 346-4000
Fax: (202) 346-4444
Email: mgiannotto@goodwinlaw.com
bburgess@goodwinlaw.com

FORD MARRIN ESPOSITO WITMEYER & GLESER, LLP
Elizabeth DeCristofaro
Wall Street Plaza, 23rd Floor
New York, NY 10005
Tel.: (212) 269-4900
Fax: (212) 344-4294
Email: edecristofaro@fordmarrin.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, or otherwise filed or made with regard to the Chapter 11 Cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Continental Casualty's: (i) right to have a final order in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the

reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Continental Casualty is or may be entitled to under agreements, in law, or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: November 19, 2019
Wilmington, Delaware

BAYARD, P.A.

/s/ Evan T. Miller

Scott D. Cousins (No. 3079)
Evan T. Miller (No. 5364)
Sophie E. Macon (No. 6562)
600 N. King Street, Suite 400
Wilmington, DE 19801
Tel.: (302) 655-5000
Fax: (302) 658-6395
scousins@bayardlaw.com
emiller@bayardlaw.com
smacon@bayardlaw.com

- and -

Michael S. Giannotto, Esq.
Brian T. Burgess, Esq.
GOODWIN PROCTER LLP
1900 N. Street, NW
Washington, DC 20036
Tel.: (202) 346-4000
Fax: (202) 346-4444

- and -

Elizabeth DeCristofaro, Esq.
FORD MARRIN ESPOSITO WITMEYER &
GLESER, LLP
Wall Street Plaza, 23rd Floor
New York, NY 10005
Tel.: (212) 269-4900
Fax: (212) 344-4294

*Counsel to Continental Casualty Company and
Transportation Insurance Company*